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October 7, 2013

VIA ECF

The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: U.S. v. Gjavit Thaqi
S-1 11 Cr. 486(DLI)

Dear Judge Irizarry:

Counsel was appointed to represent Gjavit Thaqi in the above-referenced matter. By this letter we respectfully request: (1) an extension of the time within which to file Mr. Thaqi's "Objections" to the PreSentence Investigation Report ("PSR"); and (2) an adjournment of Mr. Thaqi's sentencing which is currently scheduled for November 13, 2013.

Counsel received Mr. Thaqi's PSR on September 25, 2013. Thus, our "Objections" to the PSR must be filed no later than October 9, 2013. In the course of our review of the PSR, a number of issues have arisen. We have begun discussions with AUSA Tiscione in an effort to reconcile the difference between the plea agreement and the calculations set forth in the PSR. However, AUSA Tiscione is out of the district until Monday, October 14, 2013, making a continuation of our discussions difficult. Thus, we respectfully request a one-week extension of our time to file any "Objections" to the PSR, until October 16, 2013.

Counsel's second request for an adjournment of the sentencing date, is occasioned by my trial schedule. I will be on trial before the Hon. Brian M. Cogan in the matter of U.S. v. Joel Cacace, 08 Cr. 240, throughout the month of November and into much of December. Accordingly, counsel respectfully requests a new sentencing date on any Friday in December, 2013.

I have discussed these requests with AUSA Tiscione and he has no objection in light of our ongoing discussions.

The Court's attention to these requests is very much appreciated.

Respectfully submitted,



Susan G. Kellman

cc: Steven L. Tiscione, Esq.
Chief, Narcotics

Mary Ann Betts,
Senior, USPO

Gjavit Thaqi